

Jason S. Brookner
State Bar No. 24033684
Monica S. Blacker
State Bar No. 00796534
ANDREWS KURTH LLP
1717 Main Street, Suite 3700
Dallas, Texas 75201
Telephone: (214) 659-4400
Facsimile: (214) 659-4401

**PROPOSED ATTORNEYS FOR THE
DEBTORS AND DEBTORS IN POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
BROADSTAR WIND SYSTEMS	§	Case No. 10-33373-11
GROUP LLC,	§	
	§	
Debtor.	§	

**MOTION PURSUANT TO RULE 1015(b) OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE AND
LOCAL BANKRUPTCY RULE 1015.1 FOR AN ORDER
DIRECTING JOINT ADMINISTRATION OF CASES**

BroadStar Wind Systems Group LLC (“BroadStar” or “Debtor”), for its Motion (the “Motion”) Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Bankruptcy Rule 1015.1 for an Order Directing Joint Administration of Cases, respectfully represents:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).
2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

INTRODUCTION

3. Simultaneously herewith, on May 11, 2010 (the “Petition Date”), BroadStar filed with this Court its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

4. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtor is operating its business and managing its properties as a debtor in possession.

5. The following entities are related to BroadStar and also filed chapter 11 petitions in this Court on the Petition Date: Broadstar Wind Systems Management LLC, Broadstar Wind Systems LP, BroadStar Developments Management LLC and BroadStar Developments LP (collectively, the “Related Debtors” and, with BroadStar, the “Debtors”). Concurrently with the filing of this Motion, the Related Debtors are also requesting that each of their bankruptcy cases be jointly administered with the chapter 11 case of BroadStar.

6. No official committee, trustee or examiner have been appointed.

BACKGROUND

7. The Debtors develop wind turbine technology and, pending resolution of litigation regarding certain intellectual property, will manufacture and deploy wind turbines into the market. The Debtors currently employ nineteen employees and contractors and are headquartered in Dallas, Texas. Additional information concerning the Debtors, their capital and debt structure, and the events leading up to the commencement of these chapter 11 cases is contained in the Declaration of Roy C. King In Support of Chapter 11 Petitions and First Day Motions (the “King Declaration”), filed simultaneously herewith.

RELIEF REQUESTED

8. By this Motion, BroadStar seeks the joint administration of its case with the Related Debtors' cases under the BroadStar case number and approval of the form of caption set forth on Exhibit "A" attached hereto.

ARGUMENT AND AUTHORITY

9. Bankruptcy Rule 1015(b) provides, in relevant part:

If a joint petition or two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.

BANKR. R. FED. P. 1015. BroadStar and the Related Debtors are "affiliates" as that term is defined in section 101(2) of the Bankruptcy Code, as BroadStar directly or indirectly owns the Related Debtors. Accordingly, this Court is authorized to grant the relief requested herein.

10. The Debtors' chapter 11 cases should be jointly administered because joint administration will obviate the need for duplicative notices, motions, applications and orders, thereby saving considerable time and expense for all of the Debtors and their respective estates. In addition, due to the relationship of all of the Debtors and their related businesses, similar issues involving each Related Debtor are certain to arise during their chapter 11 cases.

11. The rights of the Debtors' respective creditors will not be adversely affected by the proposed joint administration of these cases because each creditor may still file its claim against a particular estate. In fact, the rights of all creditors will be enhanced by the reduction in costs resulting from joint administration. In addition, this Court and the Clerk's Office will be relieved of the burden of entertaining duplicate motions, entering duplicative orders and maintaining duplicative files, and supervision of the administrative aspects of the chapter 11 cases by the Office of the United States Trustee will be simplified.

12. Thus, BroadStar respectfully submits that the interests of the Debtors, their creditors, and other parties in interest would be best served by the joint administration of the Debtors' chapter 11 cases.

NOTICE

13. Notice of this Motion has been provided to the office of the United States Trustee for the Northern District of Texas, the counsel for the Debtors' secured lender, the holders of the twenty (20) largest unsecured claims against the Debtors on a consolidated basis, and certain other parties appearing on the attached Certificate of Service. BroadStar respectfully submits that no other or further notice need be provided.

WHEREFORE, BroadStar respectfully requests that the Court enter an order (i) directing joint administration of this case with the Related Debtors' chapter 11 cases, (ii) approving and adopting the proposed form of caption set forth on Exhibit "A" attached hereto, and (iii) granting such other and further relief as may be just and proper.

Respectfully submitted this 11th day of May, 2010.

ANDREWS KURTH LLP

By: /s/Monica S. Blacker

Jason S. Brookner

Texas State Bar No. 24033684

Monica S. Blacker

Texas State Bar No. 00796534

1717 Main Street, Suite 3700

Dallas, Texas 75201

Telephone: (214) 659-4400

Facsimile: (214) 659-4401

Email: jbrookner@akllp.com
mblackner@akllp.com

**PROPOSED ATTORNEYS FOR THE
DEBTORS AND DEBTORS IN
POSSESSION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of May, 2010, she caused a true and correct copy of the foregoing document to be hand delivered to the Office of the United States Trustee, Earle Cabell Federal Building, 1100 Commerce Street, Room 976, Dallas, Texas 75242 and caused the same to be served on the parties appearing on the attached Service List via first class United States mail, postage prepaid and, where possible, via electronic mail.

/s/Monica S. Blacker

Monica S. Blacker

EXHIBIT A

Proposed Form of Caption

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
BROADSTAR WIND SYSTEMS	§	Case No. 10-33373-BJH-11
GROUP LLC, <i>et al.</i> ,	§	
	§	Jointly Administered
Debtors.	§	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
BROADSTAR WIND SYSTEMS	§	Case No. 10-33373
GROUP LLC,	§	
	§	
Debtor.	§	

**ORDER PURSUANT TO RULE 1015(b) OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE AND
LOCAL BANKRUPTCY RULE 1015.1 FOR AN ORDER
DIRECTING JOINT ADMINISTRATION OF CASES**

Upon the Motion of Broadstar Wind Systems Group LLC (“BroadStar”), Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Bankruptcy Rule 1015.1 for an Order Directing Joint Administration of Cases (the “Motion”); and the Court having jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A); and it appearing that the relief requested by the Motion is in the best interest of the Debtors’ estates and creditors;

and it appearing that adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary; and after due consideration and good cause appearing therefor, it is¹

ORDERED that the Motion is hereby granted, to the extent provided herein; and it is further

ORDERED that the above-captioned case of BroadStar shall be consolidated with the chapter 11 cases of the Related Debtors, for procedural purposes only. All further pleadings in these cases shall be filed in Case No. 10-33373, and shall bear the following caption:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
BROADSTAR WIND SYSTEMS	§	Case No.10-33373-BJH
GROUP LLC, <i>et al.</i> ,	§	
Debtors.	§	Jointly Administered

and it is further

ORDERED that nothing contained in this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of BroadStar's bankruptcy estate with the bankruptcy estates of the Related Debtors; and it is further

ORDERED that creditors shall file any proofs of claims in the case of the specific Debtor and not in the jointly-administered case.

END OF ORDER # #

¹ Capitalized terms not otherwise defined herein shall have the same meaning ascribed to them in the Motion.